

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.) No. S4-4:15CR 404 HEA
)
)
OSCAR DILLON, III,)
MICHAEL GRADY,)
)
Defendants.)

**GOVERNMENT'S MOTION TO CONTINUE HEARING ON THE MOTION TO
DISMISS THE INDICTMENT AND MOTION FOR TELEPHONE CONFERENCE**

Comes now the United States of America by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri and Tom Rea and Michael A. Reilly, Assistant United States Attorneys for the Eastern District of Missouri, and for its motion to continue hearing and motion for telephone conference, states as follows:

1. Defendants' Motion to Dismiss the Indictment is currently scheduled for a hearing on February 28, 2018.
2. Prior to the hearing, Defendants have inspected sensitive and voluminous material in the U.S. Attorney's Office in St. Louis.
3. Defendant Dillon, in December 2017, requested certain documents and discovery relative to the allegations in the Motion to Dismiss. The discovery requests were voluminous and complex. The process of gathering the material was time consuming, and the material is voluminous. Some materials may require redactions. The prosecution remains in the process of inspecting, and in some cases considering redactions of the voluminous material. The prosecution

also believes it will take Defendants significant time to inspect the material prior to the hearing.

4. The United States requests that this matter be set for a telephone conference relative to this motion, at Defendants' convenience, prior to the hearing.

WHEREFORE, for the reasons stated herein, the Government requests that the previously scheduled evidentiary be continued subject to a telephone conference in this matter.

Respectfully Submitted,

JEFFREY B. JENSEN
United States Attorney

s/ Michael A. Reilly
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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2018, the foregoing was filed electronically and under seal with the Clerk of the Court; Counsel for Defendant will be served via email.

s/ Michael A. Reilly
MICHAEL A. REILLY, #43908MO
Assistant United States Attorney